

Exhibit B



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 4, 2019

By Email

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Re: *United States v. Telemaque Lavidas*, 19 Cr. 716 (DLC)

Dear Counsel:

We write in response to your request that the Government provide a bill of particulars identifying, among other things, co-conspirators of defendant Telemaque Lavidas. While we do not agree that a bill of particulars is warranted, this letter provides a voluntary disclosure that the following individuals are co-conspirators of the defendant with respect to the charged conspiracies:

[REDACTED]

by: /s/
Richard Cooper / Daniel Tracer
Assistant United States Attorneys
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